

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**In re:** ) **Chapter 11**  
 )  
**EBRO FOODS, INC.** ) **Judge Wedoff**  
 )  
**Debtor.** ) **Case No. 09-10101**  
 )  
 ) **Hearing: 1/13/2010 at 9:30 a.m.**

**NOTICE OF MOTION**

To: See attached service list

PLEASE TAKE NOTICE that I will appear on January 13, 2010 at 9:30 a.m., before the Honorable Eugene Wedoff, or any other Judge sitting in his stead, in Courtroom 744, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and will then and there present the MOTION TO EXTEND TIME TO FILE AN AMENDED PLAN AND DISCLOSURE STATEMENT, AT WHICH TIME AND PLACE YOU MAY APPEAR AND BE HEARD.

/s/ Forrest L. Ingram  
One of Debtor's attorneys

Forrest L. Ingram, P.C.  
Forrest L. Ingram #3129032  
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**CERTIFICATE OF SERVICE**

I, Philip Groben, an attorney, certify that I caused a true and correct copy of the above and foregoing Notice and the document, to which it refers, on all parties entitled to service, by electronic filing through ECF, or by regular U.S. mail, or fax, as set forth on the attached service list, at or before on January 8, 2010.

/s/ Philip Groben

***SERVICE LIST***

**Via CM/ECF**

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**Northern District of Illinois**

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**Via U.S. Mail**

**Ebro Foods, Inc.**

**1330 W. 43<sup>rd</sup> St.**

**Chicago, IL 60609**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>EBRO FOODS, INC.</b>	)	<b>Judge Wedoff</b>
	)	
<b>Debtor.</b>	)	<b>Case No. 09-10101</b>
	)	
	)	<b>Hearing: 1/13/2010 at 9:30 a.m.</b>

**MOTION TO EXTEND TIME TO FILE AMENDED PLAN AND DISCLOSURE  
STATEMENT**

Now comes the Debtor and Debtor in Possession, Ebro Foods, Inc. (the “Debtor”), by and through its attorneys, Forrest L. Ingram, P.C., and moves this Honorable Court for Extension of Time to File Amended Plan and Disclosure Statement.

In support thereof, the Debtor states as follows:

1. Debtor filed its Chapter 11 bankruptcy case on March 24, 2009.
2. On November 10, 2009, Debtor submitted its chapter 11 plan of reorganization and disclosure statement.
3. On November 24, 2009, this Court continued the status hearing on the disclosure statement and plan set for November 17, 2009 to December 15, 2009.
4. On January 13, 2009, there is a status hearing on the G&G Peppers adversary, Case No. 09 A 500. The outcome of the G&G Peppers adversary case will have a direct impact upon operation of the Debtor’s Amended plan of reorganization.
5. Debtor is also in the midst of negotiations with the Internal Revenue Service (the “IRS”) and the Bank of America (the “Bank”) regarding the extent, validity, and priority of the claims filed by both entities.

6. Debtor is also in the midst of negotiations with the Bank regarding the terms of a new lease which will allow the Debtor to operate at its current location.
7. Debtor respectfully requests this Court to extend the deadline to file a plan and disclosure statement until February 12, 2010 in order to allow time for the resolution of the G&G Peppers adversary case and to conclude settlement negotiations with the IRS and the Bank of America.

WHEREFORE, the Debtor, Ebro Foods, Inc. respectfully requests that this Honorable Court extend the deadline for Debtor to file a plan and disclosure statement to February 12, 2010, and grant the Debtor such other and further relief as this Court deems just and equitable.

Respectfully submitted,

Ebro Foods, Inc.

By: /s/ Forrest L. Ingram  
One of its attorneys

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